

# Exhibit

## A

STATE OF INDIANA ) IN THE MARION \_\_\_\_\_ COURT  
 ) SS:  
 COUNTY OF MARION ) CAUSE NO:

MICHAEL BOMMARITO, )  
 )  
 Plaintiff, ) **JURY TRIAL REQUESTED**  
 )  
 v. )  
 )  
 EMBASSY SUITES BY HILTON )  
 INDIANAPOLIS DOWNTOWN, )  
 PARK HOTELS & RESORTS INC., )  
 HILTON WORLDWIDE, INC., HILTON )  
 WORLDWIDE HOLDINGS, INC., )  
 and EMBASSY SUITES )  
 MANAGEMENT LLC, )  
 )  
 Defendants. )

### COMPLAINT FOR DAMAGES

1. Plaintiff Michael Bommarito is an individual who resides in Troy, Michigan.
2. Defendant Embassy Suites by Hilton Indianapolis Downtown (“Hotel”) is a hotel located at 110 W. Washington Street in Marion County, Indianapolis, Indiana.
3. Upon information and belief, Defendants Park Hotels & Resorts Inc., Hilton Worldwide, Inc., Hilton Worldwide Holdings, Inc., and/or Embassy Suites Management LLC own and operate the Hotel.
4. On December 11, 2018, Plaintiff was staying as a guest at the Hotel and attempted to open the glass shower door in his hotel room when the shower door fell off track, shattered, and injured Plaintiff.
5. Defendants had a duty to provide a safe hotel room to Plaintiff.
6. Defendants breached that duty when they failed to properly construct, install, and/or maintain the shower door, causing it to fall off track and injure Plaintiff.

7. Plaintiff received permanent injuries as a result of Defendants' negligence.
8. Plaintiff has been damaged in an amount to be determined at trial.

WHEREFORE Plaintiff respectfully requests that the Court enter a judgment in Plaintiff's favor and against Defendants in an amount to be determined at trial, including without limitation compensatory damages, the costs of this action, and all other just and proper relief.

**JURY DEMAND**

The Plaintiff demands a trial by jury.

Respectfully submitted

/s/ Edward M. Smid

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